

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

NO LABELS,

Plaintiff,

v.

NOLABELS.COM INC.,

Defendant.

Case No. 1:23-cv-01384-GBW

DECLARATION OF SAMANTHA BROOKS

I, Samantha Brooks, of San Diego, California, do hereby declare and state the following based on first-hand knowledge:

1. I am Vice President at No Labels since July 2020. I have a bachelor's degree in marketing from Olivet Nazarene University.
2. I submit this declaration in further support of *Plaintiff's Application for Temporary Restraining Order and/or Motion for Preliminary Injunction* based on my information, knowledge and belief and the records in this matter.
3. If called as a witness, I could and would testify competently to the information detailed in this declaration.
4. On Thursday, December 7, 2023, from my home office located in San Diego, California, I accessed the internet, utilized the Google Chrome Browser, and searched the phrase "no labels 2024."
5. In reviewing the search results, I observed that the site for "Nolabels.com[.]" received the number one ranking and was designated at the top of the list of sites that came up following my search. The result further indicated that it was "Paid for by NoLabels.Com Inc[.]"

A screen shot that shows the search term I entered, and the results provided is attached hereto as Ex. A.

6. I declare under penalty of perjury as provided by law that the statements contained in this declaration are true and correct to the best of my knowledge and belief.

EXECUTED this 14th day of December, 2023 in San Diego, California.

Samantha L. Brooks
Samantha Brooks

EXHIBIT A

Personal

no labels 2024

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Paid for by **NoLabels.Com Inc**

 [nolabels.com](https://www.nolabels.com) <https://www.nolabels.com> ::

Standing up for America — Join the Commonsense Majority

We are Problem Solvers, embodying resilience and courage, advocating for the right causes. Elevating **NoLabels**.com candidates and Americans disillusioned with current politics.

 [No Labels](https://2024.nolabels.org) <https://2024.nolabels.org> ::

A Unity ticket for 2024 - No Labels

Apr 1, 2023 — **No Labels 2024** Unity ticket. Ensuring Americans have the choice to vote for a president that will find commonsense solutions to our biggest ...

 [No Labels](https://www.nolabels.org) <https://www.nolabels.org> ::

No Labels

A national movement of people who believe in America and in bringing our leaders together to solve our toughest problems.

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 [NPR](https://www.npr.org) <https://www.npr.org> > 2023/11/02 > no-labels-democrats... ::

Democrats sound alarms over No Labels third-party bid

Nov 2, 2023 — **No Labels**, the political group focused on a third-party run, is trying to get on the ballot in all 50 states. Prominent Democrats, including ...

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